

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**AMERICAN ENVIRONMENTAL
ENTERPRISES, INC., d/b/a
THESAFETYHOUSE.COM**

Plaintiff,

V.

**MANFRED STERNBERG, ESQUIRE,
and MANFRED STERNBERG &
ASSOCIATES, PC, and CHARLTON
HOLDINGS GROUP, LLC, and
SAMUEL GROSS a/k/a SHLOMO
GROSS, and GARY WEISS,
and ASOLARDIAMOND, LLC a/k/a,
ASOLAR. LLC, and DAPHNA
ZEKARIA, ESQUIRE, and SOKOLSKI
& ZEKARIA, P.C.**

Defendants.

CIVIL ACTION

No. 2022-cv-00688 (JMY)

NOTICE OF JOINT AGREED MOTION TO ADJOURN TRIAL

TO:

- (1) Manfred Sternberg, Esquire, and
- (2) Manfred Sternberg & Associates, PC
c/o Seth Laver, Esquire (VIA EMAIL: slaver@goldbergsegalla.com)
- (3) Sam Gross and
- (4) Charlton Holdings Group, LLC
(VIA EMAIL charltonholdinggroupllc@aol.com and Scg1212@gmail.com and publicdiamonds@gmail.com and Samrosinc@icloud.com)
- (5) Gary Weiss and
- (6) ASOLARDIAMOND, LLC
(VIA EMAIL: wgary4109@gmail.com and monipair@aol.com)
- (7) Daphna Zekaria, Esquire and
- (8) SOKOLSKI & ZEKARIA, P.C.
(VIA EMAIL: Dzandpeanut@aol.com)

PLEASE TAKE NOTICE that plaintiff American Environmental Enterprises, Inc. d/b/a THE SAFETY HOUSE.COM (“TSH” or “SAFETY HOUSE”), with the consent and joinder of

defendants Manfred Sternberg, Esquire, and Manfred Sternberg & Associates, PC (collectively the "Sternberg Defendants"), hereby file their Joint Agreed Motion to Adjourn Trial, and plaintiff TSH and the Sternberg Defendants jointly seek the entry of an Order in the proposed form of Order accompanying this Motion, adjourning the trial currently scheduled for August 4, 2025.

The relief requested in this Motion has been agreed to and joined in by the Sternberg Defendants, the only two remaining active defendants in this lawsuit. Defaults have been entered against and/or requested against all of the other remaining defendants: Daphna Zekaria, Esquire, and Sokolski & Zekaria, P.C. (collectively the "Zekaria Defendants"); and Gary Weiss and ASOLARDIAMOND, LLC, a/k/a ASOLAR, LLC (collectively the "Weiss Defendants"); and Sam Gross and Charlton Holdings Group, LLC (collectively the "Gross Defendants").

Respectfully submitted,

LIGHTMAN & MANOCHI

BY: /s/ Gary P. Lightman
GARY P. LIGHTMAN, ESQUIRE
GLENN A. MANOCHI, ESQUIRE
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gmanochi@lightmanlaw.com

Date: June 4, 2025

Attorneys for plaintiff TSH

**IN THE UNITED STATES DISTRICT COURT
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**AMERICAN ENVIRONMENTAL
ENTERPRISES, INC., d/b/a
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Plaintiff,

V.

**MANFRED STERNBERG, ESQUIRE,
and MANFRED STERNBERG &
ASSOCIATES, PC, and CHARLTON
HOLDINGS GROUP, LLC, and
SAMUEL GROSS a/k/a SHLOMO
GROSS, and GARY WEISS,
and ASOLARDIAMOND, LLC a/k/a,
ASOLAR. LLC, and DAPHNA
ZEKARIA, ESQUIRE, and SOKOLSK
& ZEKARIA, P.C.**

Defendants.

CIVIL ACTION

No. 2022-cv-00688 (JMY)

JOINT AGREED MOTION TO ADJOURN TRIAL

Plaintiff American Environmental Enterprises, Inc. d/b/a THE SAFETY HOUSE.COM,
with the consent and joinder of defendants Manfred Sternberg, Esquire, and Manfred Sternberg
& Associates, PC (collectively the “Sternberg Defendants”), hereby file this Joint Agreed Motion
to Adjourn Trial, and in support thereof, states as follows:

1. A final Pre-Trial Conference was conducted virtually in this case on April 1, 2025.
2. Following the Pre-Trial Conference, the Court issued its Order on April 1, 2025 [ECF 228], scheduling trial in this case to commence on August 4, 2025.
3. Dan Scully is the principal of the plaintiff and plaintiff's main witness.

4. However, Mr. Scully underwent two major brain surgeries earlier this year, and has been undergoing treatment for his medical condition, including both chemotherapy and radiation.

5. Mr. Scully's doctor has issued a letter, stating that Mr. Scully cannot be subjected to the stress of a trial, at least through the end of this year.

6. A true and correct copy of the letter from Mr. Scully's physician, Dr. Emily Lebow, Assistant Professor of Radiation Oncology, Hospital of University of Pennsylvania Radiation Oncology, confirming her medical opinion that Mr. Scully cannot be subjected to the stress of a trial, at least through the end of this year, is being submitted as CONFIDENTIAL and accompanies this Motion as Exhibit "A" and is made a part hereof.

7. Undersigned counsel has spoken to Seth Laver, counsel for the only two defendants still active in this lawsuit – defendants Manfred Sternberg, Esquire, and Manfred Sternberg & Associates, PC (collectively, "Sternberg Defendants") –and said counsel agrees to and consents and joins in this joint request to the adjournment of the trial requested in this Motion.

8. Defaults have been entered against and/or requested against all of the other remaining defendants: Daphna Zekaria, Esquire, and Sokolski & Zekaria, P.C. (collectively the "Zekaria Defendants"); and Gary Weiss and ASOLARDIAMOND, LLC, a/k/a ASOLAR, LLC (collectively the "Weiss Defendants"); and Sam Gross and Charlton Holdings Group, LLC (collectively the "Gross Defendants").

9. Plaintiff and the Sternberg Defendants respectfully jointly request that the trial currently scheduled to commence on August 4, 2025, be adjourned generally, and that the Court schedule a status conference in this case for in or after January 2026, to assess the medical

condition of Mr. Scully at that time, and a new date for the trial if his medical condition at that time permits.

10. Movants respectfully submit that the requested adjournment of the trial due to the medical condition of plaintiff's principal and main witness is in the interests of justice.

11. Movants respectfully submit that the requested adjournment of the trial due to the medical condition of plaintiff will not result in any prejudice, especially inasmuch as it is the plaintiff (with the Stenberg Defendants) that is requesting that the trial be delayed, and none of the other defendants are active in this case, defaults having been requested and/or entered against them.

WHEREFORE, plaintiff American Environmental Enterprises, Inc. d/b/a THE SAFETY HOUSE.COM, and the Stenberg Defendants respectfully request that the Court grant this Joint Agreed Motion to Adjourn Trial, and enter the form of Consent Order accompanying this Motion, and grant movants such other and further relief as the Court shall deem just.


Respectfully submitted,

STERNBERG DEFENDANTS:

BY: 
Seth Laver, Esquire
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Philadelphia, PA 19103-3907
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Attorneys for Stenberg Defendants

PLAINTIFF:

BY: 
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Telephone: 215-760-3000
garylighman@lightmanlaw.com

Attorneys for plaintiff

DATED: June 4, 2025

CERTIFICATION OF COUNSEL

I certify that the foregoing factual statements made by me are true to the best of my knowledge, information and belief. I am aware that if the foregoing statements made by me are willfully false, I am subject to punishment.

BY: /s/ Gary P. Lightman
GARY P. LIGHTMAN, ESQUIRE

Date: June 2, 2025

Attorneys for plaintiff

EXHIBITS TO AGREED MOTION TO ADJOURN TRIAL

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
"A"	4/28/25 letter from Dr. Emily Lebow, Assistant Professor of Radiation Oncology, Hospital of University of Pennsylvania Radiation Oncology (filed as CONFIDENTIAL)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date shown below he caused to be served a true and correct copy of Plaintiff's Agreed Motion to Adjourn Trial, via first class mail and/or email upon the following:

Seth Laver, Esquire
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LIGHTMAN & MANOCHI

BY: /s/ Gary P. Lightman
GARY P. LIGHTMAN, ESQUIRE

Date: June 4, 2025

Attorneys for plaintiff TSH

3. The deadlines in the Court's Scheduling Order dated and entered April 1, 2025 [ECF 228] are continued generally.

4. The Court will schedule a status conference in this case in or after January 2026, to determine the medical condition of Dan Scully at that time, and the setting of a new trial date in this case.

BY THE COURT:

John M. Younge, U.S.D.J.

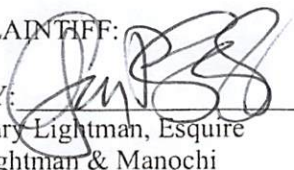
We hereby consent to the form and entry of the aforesaid Order, with the due authorization of our respective clients:

STERNBERG DEFENDANTS:

BY: 
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